| 1<br>2<br>3<br>4 | MICHELE BECKWITH Acting United States Attorney KEVIN C. KHASIGIAN Assistant United States Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700 |   |
|------------------|--|---|
| 5                | Attorneys for the United States  |   |
| 6                |  |   |
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| 8                |  |   |
| 9                | IN THE UNITED STATES DISTRICT COURT  |   |
| 10               | EASTERN DISTRICT OF CALIFORNIA   |   |
| 11               |  |   |
| 12               | UNITED STATES OF AMERICA,  | Case No. 1:23-MC-00086-NODJ   |
| 13               | Plaintiff,   | STIPULATION AND ORDER EXTENDING TIME                                    |
| 14               | v.   | FOR FILING A COMPLAINT FOR FORFEITURE<br>AND/OR TO OBTAIN AN INDICTMENT |
| 15<br>16         | 2018 MASERATI GRAN TURISMO,<br>LICENSE NUMBER 8EOX182, VIN:<br>ZAM45VLA3J0253945 <sup>1</sup> ,  | ALLEGING FORFEITURE   |
| 17               | APPROXIMATELY \$68,119.88 SEIZED   |   |
| 18               | FROM E*TRADE ACCOUNT NUMBER 5147-0717, HELD IN THE NAME OF   |   |
| 19               | VIKEN YEPREMIAN, and   |   |
| 20               | APPROXIMATELY \$71,207.76 SEIZED<br>FROM GOLDMAN SACHS, MARCUS<br>ONLINE SAVINGS ACCOUNT NUMBER  |   |
| 21               | 300007772619, HELD IN THE NAME OF VIKEN YEPREMIAN,   |   |
| 22               | ŕ  |   |
| 23               | Defendants.  |   |
| 24               | It is hereby stipulated by and between the United States of America, potential claimants Viken   |   |
| 25               | Yepremian and Sonia Yepremian ("Viken" and "Sonia"), by and through their respective counsel, and  |   |

<sup>1</sup> This asset was returned to Viken and Mardig Yepremian in exchange for \$50,250.00 and is the substitutes *res*.

potential claimant and Mardig Yepremian ("Mardig"), appearing in propria persona (collectively

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"claimants") as follows:

- 1. On or about June 6, 2023, claimants Viken and Sonia filed claims in the administrative forfeiture proceeding with the Federal Bureau of Investigation ("FBI") with respect to the Approximately \$71,207.76 seized from Goldman Sachs, Marcus Online Savings account number 300007772619, held in the name of Viken Yepremian and Approximately \$68,119.88 seized from E\*Trade account number 5147-0717, held in the name of Viken Yepremian which were seized on March 10, 2023. Claims were filed by Viken and Mardig on or about June 6, 2023, in the administrative forfeiture proceeding with the FBI with respect to the 2018 Maserati Gran Turismo, License Number 8EOX182, VIN: ZAM45VLA3J0253945, which was seized on March 16, 2023 (hereafter collectively the "defendant assets").
- 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants have filed a claim to the defendant assets as required by law in the administrative forfeiture proceeding.
- 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was September 4, 2023.
- 4. By Stipulation and Order filed August 30, 2023, the parties stipulated to extend to November 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 5. By Stipulation and Order filed November 8, 2023, the parties stipulated to extend to February 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 6. By Stipulation and Order filed February 27, 2024, the parties stipulated to extend to May 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the

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defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

- 7. By Stipulation and Order filed May 13, 2024, the parties stipulated to extend to October 25, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 8. By Stipulation and Order filed October 23, 2024, the parties stipulated to extend to February 28, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 9. By Stipulation and Order filed February 20, 2025, the parties stipulated to extend to May 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to August 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 11. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture shall be extended to August 29, 2025.

Dated: May 20, 2025 MICHELE BECKWITH
Acting United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: May 13, 2025 /s/ Alaleh Kamran

ALALEH KAMRAN
Attorney for potential claimants

Attorney for potential claimants
Viken Yepremian and Sonia Yepremian
(Signature approved by email)

(Signature approved by email)

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Dated: May 13, 2025 /s/ Mardig Yepremian MARDIG YEPREMIAN **Potential Claimant** Appearing *in propria persona* 9544 N. Larkspur Avenue Fresno, CA 93720 (Signature retained by attorney) IT IS SO ORDERED. Dated: May 20, 2025 Troy L. Nunley Chief United States District Judge